

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BLUEBECK HOLDINGS LTD.,	)	
	)	
Plaintiff,	)	CASE NO: 3:23-cv-02095-MEM
	)	
v.	)	JUDGE KAROLINE MEHALCHICK
	)	
SWN PRODUCTION COMPANY,	)	
LLC, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**DECLARATION OF CHRISTOPHER W. LACY**

Pursuant to 28 U.S.C. § 1746, Christopher W. Lacy declares as follows:

1. My full name is Christopher W. Lacy, and I am an adult individual and resident of Montgomery County, Texas.
2. I am over eighteen years of age, under no mental or legal disability, and competent to testify as to the matters set forth herein.
3. I am employed as Senior Vice President, General Counsel, and Corporate Secretary of Southwestern Energy Company (“Southwestern”), which has been named as one of the several corporate-entity defendants in the above-captioned action.
4. The other two corporate entities named as defendants in this action are SWN Production Company, LLC (“SWN Production”), which is a Texas limited

liability company whose sole member is Southwestern, and SWN Energy Services Company, LLC (“SES”), which also is a Texas limited liability company whose sole member is SWN Midstream Services Company, LLC, whose sole member is Southwestern.

5. The corporate officers of Southwestern perform their duties and hold their regular meetings in Texas.

6. The directors of Southwestern typically hold regular Board meetings in Spring, Texas. On occasion, Board meetings have been held virtually, but, to my knowledge, no director has participated in a virtual meeting from the Commonwealth of Pennsylvania.

7. The directors and corporate officers of Southwestern have never held an in-person board or shareholder meeting in the Commonwealth of Pennsylvania.

8. The Forms 10-Q and 10-K that are discussed in the Complaint were all prepared in Southwestern’s office in Spring, Texas, and were never mailed or otherwise delivered to Plaintiff or its predecessor-in-interest at either their East Norwich, New York, address, or any address in the Commonwealth of Pennsylvania. Instead, such reports were electronically filed from Spring, Texas, with the United States Securities and Exchange Commission in Washington, D.C.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on this 1st day of March, 2024.

/s/ Christopher W. Lacy

Christopher W. Lacy